

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

In Re:

Addie Mae Simmons
Debtors

* Bankruptcy Case #15-10291

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Addie Mae Simmons
Plaintiff

* Chapter 13

*

v.

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WILMINGTON SAVINGS FUND SOCIETY,
FSB d/b/a CHRISTIANA TRUST
AS TRUSTEE FOR PNPMS TRUST II

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* Adv. Proc. No. 21-01001

AMENDED JOINT MOTION TO EXTEND DISCOVERY

Plaintiff ADDIE MAE SIMMONS, and Defendant, WILMINGTON SAVINGS FUND SOCIETY FSB d/b/a CHRISTANA TRUST AS TRUSTEE FOR PNPMS TRUST II, (collectively, the “parties”), by and through their undersigned counsel, jointly move the Court for an Order to extend the expiration of discovery, along with the deadlines for filing dispositive motions, by ninety (90) days. This Joint Motion is not being filed for the improper purpose of causing undue delay.

1. Plaintiff filed the instant Adversary on January 21, 2021. Defendant filed its Answer on March 23, 2021. A Pre-Trial Conference was held on March 18, 2021, at which time the Court entered a Scheduling Order setting a Status Conference and Rule 16 Deadlines.
2. The discovery deadline expires June 21, 2021.
3. Pursuant to the Court’s Order Scheduling Status Conference and Rule 16 Deadlines, this Motion is being filed requesting this Court to grant an extension of

discovery for ninety (90) days beyond June 21, 2021, jointly by the parties to complete discovery. The deadline for Summary Judgement shall be extended to 30 days after the end of discovery.

4. Plaintiff died, and the under signed attorney is filing an administration for plaintiff's estate for her daughter Adrien Leeks. The Daughter, as administrator, will be substituted as the appropriate party to the lawsuit and to complete discovery.
5. The parties herein are currently engaged in discovery in furtherance of the issues in dispute, and additional discovery is warranted.
6. The parties respectfully request that the present discovery deadline be extended for a minimum period of 90 days from the date of Order setting the discovery deadline, or until September 20, 2021.
7. A proposed order extending the discovery period will be uploaded for the Court's consideration.

WHEREFORE, based upon the above-stated reasons, Defendant requests that the discovery deadline be extended until and including September 20, 2021, and the parties hereby further agree that the remaining terms and conditions of the Court's Scheduling Order, entered March 24, 2021, remain in effect.

Respectfully submitted, this 30th day of June 2021.

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/s/ Shelba D. Sellers
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CERTIFICATE OF SERVICE

I, Shelba D. Sellers, Sellers & Mitchell, P.C., P.O. Box 1157, Thomasville, Georgia 31799, hereby certify that on this date, I electronically filed the within and foregoing **AMENDED MOTION FOR EXTENSION OF DISCOVERY PERIOD**, with the Clerk of the Court using the CM/ECF system. I also certify that Attorney for Plaintiff will be served on this date by electronic means of the Court.

Respectfully submitted, this 30th day of June 2021.

/s/ Shelba D. Sellers

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